

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

- (1) ALAN GOMEZ-MARENTES (aka  
GUAJAS),
- (2) JUAN ANTONIO GONZALEZ-  
CARRILLO (aka TOTO),
- (3) LUIS ARTURO MAGANA-  
RAMIREZ (aka GUERO),
- (4) JOSE ELIAS BARBOSA (aka PRIMO,  
aka PRIETO),
- (5) JOSE DANIEL ESPINOZA (aka  
APACHE),
- (6) ESTEFHANY COREA-MENDOZA  
(aka SICARIA),
- (7) ADRIAN IZAZAGA-MARTINEZ,
- (8) JORGE MONDRAGON,
- (9) BENJAMIN FUENTES (aka  
CHANCHAS),
- (10) LUIS ZAVALZA-SANCHEZ (aka  
FLAKO),
- (11) ALYSHA JONES (aka MANDY),
- (12) ARMANDO FIERRO-PONCE,
- (13) AMANDA MEYER,
- (14) MICHAEL ANDREW WOOD,
- (15) LUIS CASTILLO-BARRAGAN,
- (16) EFRAIN LUNA-RODRIGUEZ,

CASE NO. CR20-092 JCC

**UNITED STATES' MOTION FOR  
LEAVE TO LATE-FILE REPLY IN  
SUPPORT OF MOTION TO  
CONTINUE TRIAL DATE [Dkt. 223]**

NOTED: September 11, 2020

(17) JULIAN PINEDA CASILLAS,  
 (18) BLANCA MEDINA,  
 (19) RUTH MELISA GOMEZ-  
 MARENTES, and  
 (20) ADRIAN SIMS,

Defendants.

The United States of America, by Brian T. Moran, United States Attorney for the Western District of Washington, and Amy Jaquette and Marci L. Ellsworth, Assistant United States Attorneys for said District, hereby moves the Court for leave to late-file its reply in support of its motion to continue the trial date, presently set for September 21, 2020. As a result of heavy caseloads and the need to gather up-to-date factual information from FDC SeaTac, undersigned counsel inadvertently missed the filing deadline for a reply brief, on the noting date – Friday, August 28, 2020. Counsel apologizes to the Court and counsel for the mistake. Given that this response is being filed shortly thereafter, the undersigned does not believe that any prejudice has resulted.

Counsel for the two defendants who filed oppositions were contacted. One does not oppose this motion; the government did not yet hear back from the other.

DATED this 1st day of September, 2020.

Respectfully submitted,

BRIAN T. MORAN  
 United States Attorney

s/ Amy Jaquette  
 AMY JAQUETTE  
 MARCI L. ELLSWORTH

Assistant United States Attorneys  
 Telephone: (206) 553-4127  
 E-mail: amy.jaquette@usdoj.gov  
 marci.ellsworth@usdoj.gov